

Armen Kiramijyan, Esq. (State Bar No. 276723)
Vahag Matevosian, Esq. (State Bar No. 283710)
Consumerlitigationteam@kaass.com



KAASS LAW
313 East Broadway, #944
Glendale, California 91209
Telephone: 310.943.1171

Attorneys for Plaintiff
HAYKUHI AVETISYAN

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

HAYKUHI AVETISYAN, an
individual;

Plaintiff,

vs.

EQUIFAX INFORMATION
SERVICES LLC, a Georgia Limited
Liability Company;
Defendant.

Case No. **CV 14-0161 JEM**

COMPLAINT FOR:

1. Willful Violations of Federal Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq.;
2. Negligent Violations of Federal Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq.;
3. Intentional Violations of California Consumer Credit Reporting Agencies Act, Cal. Civ. Code § 1785 et seq.;
4. Negligent Violations of California Consumer Credit Reporting Agencies Act, Cal. Civ. Code § 1785 et seq.

JURY TRIAL DEMANDED

Plaintiff, through counsel, alleges:

NATURE OF ACTION

This is a private action brought by an individual consumer under Federal Fair Credit Reporting Act ("FCRA"), 15 U.S.C. §1681 et seq.; and its equivalent State Act:

1 Consumer Credit Reporting Agencies Act (“CCRAA”), Cal. Civ. Code §1785 et seq.

2 **JURISDICTION AND VENUE**

3 1. This Court has jurisdiction under 15 U.S.C. §1681p, Cal. Civ. Code §
4 1785.33, and 28 U.S.C. § 1331.

5 2. This Court has supplemental jurisdiction over the State claims under 28
6 U.S.C. §1367(a).

7 3. Venue is proper before this Court pursuant to 28 U.S.C. § 1391(b), where the
8 acts or events giving rise to this action occurred in the State of California in the Central
9 District of California, and where Defendant transacts business in said State and district.

10 **PARTIES**

11 4. Plaintiff HAYKUHI AVETISYAN (“Plaintiff”) is an individual who at all
12 relevant times resided in the State of California, County of Los Angeles.

13 5. Plaintiff is a “consumer” as defined by 15 U.S.C. § 1681a(c) and Cal. Civ.
14 Code § 1785.3(b).

15 6. Plaintiff is the victim of identity theft pursuant to 15 U.S.C. §1681c-2.

16 7. Defendant EQUIFAX INFORMATION SERVICES LLC (“Defendant”) is a
17 Georgia Limited Liability Company, conducting business in the State of California.

18 8. Defendant is a “person” as defined by 15 U.S.C. § 1681a(b) and Cal. Civ.
19 Code § 1785.3(j).

20 9. Defendant is a “Consumer reporting agency” and “Consumer credit reporting
21 agency” as defined by 15 U.S.C. § 1681a(f) and Cal. Civ. Code § 1785.3(d),
22 respectively.

23 10. When a reference in this Complaint is made to any act or omission of
24 Defendant’s corporation, company, association, business entity, or partnership, such
25 allegation shall be deemed to mean that the Defendant and its owners, officers,
26 directors, agents, employees, or representatives did or authorized such act or omission
27 while engaged in the management, direction, or control of the affairs of Defendant and
28 while acting within the scope and course of their duties.

FACTUAL ALLEGATIONS

11. In or around July of 2012, Plaintiff arrived to the United States of America, nearly ten years after her first visit in 2002.

12. On or about July of 2012, Plaintiff attempted to open an account with Citibank but was informed that she already had an account with Citibank. Plaintiff contacted several other banks and found out that there were multiple other accounts opened in her name. Plaintiff was bewildered because she had never opened any accounts, whatsoever, with Citibank or any other bank for that matter.

13. Consequently, Plaintiff obtained her credit reports and was shocked to find thirty-nine (39) accounts (hereinafter "accounts") reported under her name. These accounts were opened between June, 2004 and June, 2011 when Plaintiff was not even present in the United States.

14. Plaintiff had never applied for, opened, used, or benefited from the accounts, nor had she given anyone authorization to use her personal information to open any accounts. Plaintiff did not even know of these accounts prior to discovering them on her credit report. As such, Plaintiff concluded that her identity was used fraudulently to open and use these accounts.

15. On July 17, 2012, Plaintiff went to Glendale Police Department and filed an identity theft victim's report pursuant to Penal Code § 530.5 concerning the fraudulent accounts. A true and correct copy of Plaintiff's identity theft victim's report from Glendale Police Department is attached hereto as EXHIBIT "A."

16. On or about July 23, 2012, Plaintiff sent a letter to Defendant, informing that the accounts reported on her credit report are inaccurate, that she has no knowledge of the accounts, and that the accounts do not belong to her. Plaintiff requested that Defendant investigate and delete the accounts from her credit report.

17. Following Plaintiff's dispute of the accounts, Defendant failed to conduct reasonable investigation and continued to maintain fraudulent accounts on Plaintiff's credit report.

1 18. On or about August 24, 2012, Plaintiff, through attorney-in-fact, sent a
2 follow up letter to Defendant, requesting Method of Verification for each disputed
3 account Defendant had allegedly verified. Defendant failed to respond to Plaintiff's
4 Method of Verification request.

5 19. On or about August 31, 2012, Plaintiff, through attorney-in-fact, sent a third
6 letter to Defendant to follow up on her request for Method of Verification. Defendant
7 again failed to respond to Plaintiff's request for Method of Verification.

8 20. On or about October 4, 2012, Plaintiff sent a fourth letter to Defendant
9 because Defendant continued to maintain the fraudulent accounts on Plaintiff's credit
10 report. In her letter, Plaintiff notified Defendant that the accounts are fraudulent, that
11 she had contacted the police department and the Federal Trade Commission, and that
12 she had obtained an identity theft report and affidavit, copies of which were attached to
13 the letter along with a copy of Plaintiff's identification documents. A true and correct
14 copy of Plaintiff's October 4, 2012 letter addressed to Defendant is attached hereto as
15 EXHIBIT "B."

16 21. Again, Defendant failed to conduct reasonable investigation and failed to
17 block and delete the fraudulent accounts from Plaintiff's credit report.

18 22. On or about October 19, 2012, Plaintiff, through attorney-in-fact, sent a fifth
19 letter to Defendant, addressing how it failed to block/delete the fraudulent accounts
20 from reporting and requesting deletion of those accounts. Defendant again failed to
21 remove the fraudulent accounts from Plaintiff's credit report.

22 23. On July 18, 2013, Plaintiff sent a sixth letter to Defendant regarding the
23 continuous reporting/maintaining of fraudulent accounts on her credit report along with
24 copies of her identity theft victim's report provided by the Glendale Police
25 Department, her fraud affidavit, and identification documents. A true and correct copy
26 of Plaintiff's July 18, 2013 letter addressed to Defendant is attached hereto as
27 EXHIBIT "C."

28 24. Plaintiff's July 18, 2013 letter and the fraud affidavit identified and described

1 the fraudulent information and included Plaintiff's statement that the information is
2 fraudulent.

3 25.Once again, Defendant failed to block/delete the fraudulent accounts from
4 Plaintiff's credit report.

5 26.On or about September 23, 2013, Plaintiff sent a seventh letter to Defendant,
6 identifying several fraudulent accounts, reported in good standing, which she had
7 inadvertently left off of her previous correspondences, and requesting that Defendant
8 block them along with those she had previously identified as fraudulent. A true and
9 correct copy of Plaintiff's September 23, 2013 letter addressed to Defendant is attached
10 hereto as EXHIBIT "D."

11 27.Defendant again failed to block/delete all the fraudulent accounts identified.

12 28.On or about October 31, 2013, Plaintiff sent an eighth letter to Defendant
13 addressing how after providing numerous notices of the fraud, copies of her identity
14 theft police report and affidavit, and copies of her identification documents, Defendant
15 failed to block and continued to maintain at least ten fraudulent accounts on Plaintiff's
16 credit report. Plaintiff requested that Defendant delete the fraudulent accounts to
17 prevent further damage to her credit. A true and correct copy of Plaintiff's October 31,
18 2013 letter addressed to Defendant is attached hereto as EXHIBIT "E."

19 29.Once again, Defendant disregarded Plaintiff's request and failed to delete
20 fraudulent accounts from Plaintiff's credit report.

21 30.Defendant declined Plaintiff's request to block, reasonably reinvestigate, and
22 delete fraudulent credit information from her credit file.

23 31.To date, Defendant still continues to maintain fraudulent accounts on
24 Plaintiff's credit report.

25 32.As a result of Defendant's conduct, Plaintiff's creditworthiness is negatively
26 impacted, which in turn caused Plaintiff, as a consumer and borrower, to suffer
27 financial and emotional distress, including but not limited to the following:

28 a. Actual damages caused by monetary losses relating to denials to obtain

1 accounts and credit, and loss of credit and loan opportunities;

2 b. Out of pocket expenses incurred as a result of communications with
3 Defendant, in addition to fees paid to attorneys and credit professionals for
4 the assistance attained in the process;

5 c. Emotional distress, mental anguish, and other health issues and
6 consequential medical expenses associated with fraudulent derogatory credit
7 information Defendant maintains about Plaintiff, has released, and continues
8 to release to third parties with access to Plaintiff's credit reports;

9 d. Decreased credit rating and creditworthiness which resulted or will result
10 in denials to obtain new credit, employment or housing on future attempts.

11 **FIRST COUNT**

12 **(Willful Violations of FCRA, 15 U.S.C. § 1681 et seq.)**

13 33.Plaintiff repeats and repleads each and every allegation contained in all prior
14 paragraphs and incorporates the same herein by reference.

15 34.Defendant prepared, compiled, issued, assembled, transferred, published, and
16 otherwise reproduced "consumer reports" regarding the Plaintiff, as this term is
17 defined in FCRA, 15 U.S.C. § 1681a(d), which contained inaccurate and fraudulent
18 information.

19 35.Defendant willfully violated FCRA, including but not limited to:

20 a. failing to follow reasonable procedures to assure maximum possible
21 accuracy of the information in Plaintiff's credit report, as required by 15
22 U.S.C. § 1681e(b);

23 b. failing to adopt and follow reasonable procedures to insure proper
24 investigation, accuracy, and blocking/deletion of fraudulent information in
25 Plaintiff's credit file, in compliance with the reinvestigation requirements of
26 15 U.S.C. § 1681i;

27 c. providing Plaintiff's credit report to parties without determining that these
28 parties had a permissible purpose to obtain Plaintiff's credit file pursuant to

1 15 U.S.C. § 1681b;

2 d. failing to block the reporting of information in Plaintiff's credit file that
3 Plaintiff identified as information that resulted from identity theft, within 4
4 business days after receipt of appropriate proof of the Plaintiff's identity, a
5 copy of Plaintiff's identity theft police report, a letter and a signed affidavit
6 from Plaintiff identifying the fraudulent information and declaring that such
7 information does not relate to any transaction by Plaintiff, required by 15
8 U.S.C. § 1681c-2(a);

9 e. failing to notify the furnishers of the fraudulent information that the
10 information may be a result of identity theft, that an identity theft report has
11 been filed, that a block has been requested, and of the effective dates of the
12 block 15 U.S.C. § 1681c-2(b);

13 36. Defendant's violations actually and proximately caused Plaintiff's injuries.

14 37. Plaintiff prays for declaratory relief pursuant to 28 U.S.C. § 2201 and § 2202,
15 that Defendant violated the FCRA.

16 38. Plaintiff further prays for actual and statutory damages pursuant to 15 U.S.C.
17 § 1681n (a)(1)(A); costs and attorney's fees pursuant to 15 U.S.C. § 1681n (c); and
18 punitive damages for Defendant's willful noncompliance pursuant to 15 U.S.C. §
19 1681n (a)(2).

20 SECOND COUNT

21 (Negligent Violations of FCRA, 15 U.S.C. § 1681 et seq.)

22 39. Plaintiff repeats and repleads each and every allegation contained in all prior
23 paragraphs and incorporates the same herein by reference.

24 40. Defendant prepared, compiled, issued, assembled, transferred, published, and
25 otherwise reproduced "consumer reports" regarding the Plaintiff, as this term is
26 defined in FCRA, 15 U.S.C. § 1681a(d), which contained inaccurate and fraudulent
27 information.

28 41. Defendant negligently violated FCRA, including but not limited to:

a. failing to follow reasonable procedures to assure maximum possible accuracy of the information in Plaintiff's credit report, as required by 15 U.S.C. § 1681e(b);

b. failing to adopt and follow reasonable procedures to insure proper investigation, accuracy, and blocking/deletion of fraudulent information in Plaintiff's credit file, in compliance with the reinvestigation requirements of 15 U.S.C. § 1681i;

c. providing Plaintiff's credit report to parties without determining that these parties had a permissible purpose to obtain Plaintiff's credit file pursuant to 15 U.S.C. § 1681b;

d. failing to block the reporting of information in Plaintiff's credit file that Plaintiff identified as information that resulted from identity theft, within 4 business days after receipt of appropriate proof of the Plaintiff's identity, a copy of Plaintiff's identity theft police report, a letter and a signed affidavit from Plaintiff identifying the fraudulent information and declaring that such information does not relate to any transaction by Plaintiff, required by 15 U.S.C. § 1681c-2(a);

e. failing to notify the furnishers of the fraudulent information that the information may be a result of identity theft, that an identity theft report has been filed, that a block has been requested, and of the effective dates of the block 15 U.S.C. § 1681c-2(b);

42. Defendant's violations actually and proximately caused Plaintiff's injuries.

43. Plaintiff prays for declaratory relief pursuant to 28 U.S.C. § 2201 and § 2202, that Defendant is in violation of the FCRA.

44. Plaintiff is entitled to actual damages pursuant to 15 U.S.C. § 1681o(a)(1), and costs and attorney's fees pursuant to 15 U.S.C. § 1681o(a)(2).

THIRD COUNT

(Intentional Violations of CCRAA, Cal. Civ. Code § 1785 et seq.)

1 45.Plaintiff repeats and repleads each and every allegation contained in all prior
2 paragraphs and incorporates the same herein by reference.

3 46.Defendant prepared, compiled, issued, assembled, transferred, published, and
4 otherwise reproduced “consumer reports” regarding the Plaintiff, as this term is
5 defined in CCRAA, Cal. Civ. Code § 1785.3(a)(3)(c), which contained inaccurate and
6 fraudulent information.

7 47.Defendant willfully violated CCRAA, including but not limited to:

- 8 a. failing to follow reasonable procedures to assure maximum possible
9 accuracy of the information in Plaintiff’s credit report, as required by Cal.
10 Civ. Code § 1785.14(b);
11 b. failing to adopt and follow reasonable procedures to insure proper
12 investigation, accuracy, and blocking/deletion of inaccurate/fraudulent
13 information in Plaintiff’s credit file, in compliance with the reinvestigation
14 requirements of Cal. Civ. Code § 1785.16;
15 c. providing Plaintiff’s credit report to parties without determining that these
16 parties had a permissible purpose to obtain Plaintiff’s credit file pursuant to
17 Cal. Civ. Code § 1785.14(a);
18 d. failing to promptly and permanently block the reporting of fraudulent
19 information from Plaintiff’s credit file after receipt of a copy of Plaintiff’s
20 identity theft police report, as required by Cal. Civ. Code § 1785.16(k);

21 48.Defendant’s violations actually and proximately caused Plaintiff’s injuries.

22 49.As a result of the Defendant’s violations of the CCRAA, Plaintiff suffered
23 personal humiliation, embarrassment, mental anguish, and emotional distress. Plaintiff
24 is entitled to actual damages pursuant to Cal. Civ. Code § 1785.31(a)(2)(A); punitive
25 damages for Defendant’s willful noncompliance pursuant to Cal. Civ. Code §
26 1785.31(a)(2)(B); and injunctive relief ordering Defendant to delete the fraudulent
27 accounts from Plaintiff’s credit report, pursuant to Cal. Civ. Code § 1785.31(b).

28 **FOURTH COUNT**

(Negligent Violations of CCRAA, Cal. Civ. Code § 1785 et seq.)

50. Plaintiff repeats and repleads each and every allegation contained in all prior paragraphs and incorporates the same herein by reference.

51. Defendant prepared, compiled, issued, assembled, transferred, published, and otherwise reproduced “consumer reports” regarding the Plaintiff, as this term is defined in CCRAA, Cal. Civ. Code § 1785.3(a)(3)(c), which contained inaccurate and fraudulent information.

52. Defendant negligently violated CCRAA, including but not limited to:

- a. failing to follow reasonable procedures to assure maximum possible accuracy of the information in Plaintiff’s credit report, as required by Cal. Civ. Code § 1785.14(b);
- b. failing to adopt and follow reasonable procedures to insure proper investigation, accuracy, and blocking/deletion of inaccurate/fraudulent information in Plaintiff’s credit file, in compliance with the reinvestigation requirements of Cal. Civ. Code § 1785.16;
- c. providing Plaintiff’s credit report to parties without determining that these parties had a permissible purpose to obtain Plaintiff’s credit file pursuant to Cal. Civ. Code § 1785.14(a);
- d. failing to promptly and permanently block the reporting of fraudulent information from Plaintiff’s credit file after receipt of a copy of Plaintiff’s identity theft police report, as required by Cal. Civ. Code § 1785.16(k);

53. Defendant’s violations actually and proximately caused Plaintiff’s injuries.

54. As a result of the Defendant’s violations, Plaintiff suffered personal humiliation, embarrassment, mental anguish, and emotional distress. Plaintiff is entitled to actual damages, including court costs and attorney’s fees; pain and suffering, pursuant to Cal. Civ. Code § 1785.31(a)(1); and injunctive relief ordering Defendant to delete the fraudulent accounts from Plaintiff’s credit report, pursuant to Cal. Civ. Code § 1785.31(b).

PRAYER FOR RELIEF FOR ALL COUNTS

WHEREFORE, Plaintiff prays for relief against Defendant as follows:

1. Actual damages;
2. Statutory damages;
3. Legal fees and costs;
4. Prejudgment and postjudgment interest;
5. Punitive damages;
6. Declaratory relief;
7. Injunctive relief;
8. Any additional remedies as the court deems proper.

Plaintiff requests trial by jury.

DATED: January 8, 2014

KAASS LAW

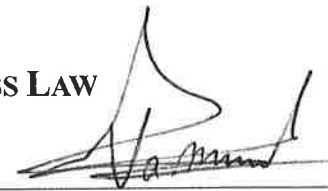
By: 
Vahag Matevosian, Esq.
Attorney for Plaintiff

EXHIBIT A

Glendale Police Dept.

131 N. Isabel St
Glendale, CA
91206
(818) 548-4840

12-10116Supplement No
ORIG

Reported Date
07/17/2012
Rpt/Incident Typ
COURTESY REPORT
Member#/Dept ID#
LAU, JENNY

Unauthorized Release of Information Prohibited - 13303

Administrative Information

Agency Glendale Police Dept.	Report No 12-10116	Supplement No ORIG	Reported Date 07/17/2012	Reported Time 12:19	CAD Call No 120717137
Status Report to Follow - In Process		Rpt/Incident Typ COURTESY REPORT			
Location [REDACTED]			City GLENDALE	ZIP Code 91205	Rep Dist 284
From Date 06/01/2004	From Time 00:01	To Date 06/30/2011	To Time 24:00	Member#/Dept ID# 14402/LAU, JENNY	
Assignment PATROL	Entered by 14402	Assignment PATROL	RMS Transfer Successful	Prop Trans Stat Successful	Approving Officer 14998
Approval Date 07/17/2012	Approval Time 16:01:24		RC Status Freeze Report		
ITEMS ATTACHED (rev 3/05) Yes		OTHER Yes			
# Offenses 1	Offense 530.5 (A) PC		Description GET CREDIT/ETC OTHER	Complaint Type	

Person Summary

Invl VIC	Invl No 1	Type I	Name AVETISYAN, HAYKUHI	MNI 891609	Race	Sex F	DOB 12/07/1982
--------------------	---------------------	------------------	-----------------------------------	----------------------	------	-----------------	--------------------------

Summary Narrative

Unauthorized accounts opened using Victim's personal information.

I HEREBY CERTIFY THAT THE ATTACHED
IS A TRUE AND CERTIFIED COPY OF

ON FILE IN THE RECORD BUREAU OF THE
POLICE DEPARTMENT IN THE CITY OF
GLENDALE.

DATED 7/20/12
Edi [Signature]
for Dnda. Petters
RECORDS ADMINISTRATOR

12-10116

Supplement No
ORIG

Glendale Police Dept.

Victim of Listed Offense Original Rpt Only 1: AVETISYAN, HAYKUHI							
Involvement Victim of Listed Offense Original Rpt Only				Inv No 1			
Name AVETISYAN, HAYKUHI		MINI 891609	Sex FEMALE	Date 07/1982	Age 29	Juvenile? No	Hair Color BROWN
PRN 924366							
Type VACATION ADDRESS		Address			City GLENDALE		
State CALIFORNIA	ZIP Code 91205	Date 07/17/2012					
Phone Type CELL	Phone No (347) 469-6223	Date 07/17/2012					
Narrative							

On 7-17-12 at approx 1215 hrs, Vict Avetisyan came to the front desk to file an identity theft report.

Avetisyan told me the first time she came to the United States was in 2002 from Yerevan, Armenia. Avetisyan was on a J1 Visa for work and school. Avetisyan arrived to the United States on 6-11-02 and left to return to Armenia in October 2002. Avetisyan stated during that time, she had not opened any accounts and the only ID she had was her passport. Avetisyan did get a social security card (# [REDACTED]) issued to her for work purpose only that was authorized by the INS.

Avetisyan have not been back to the United States since 2002 until 6-29-12 when she arrived in the United States from Armenia. Avetisyan is staying with her sister in Glendale. On 7-12-12 Avetisyan went to Citibank to open a checking account because she will eventually be coming to the United States for business. Avetisyan was denied the checking account because she was told she already have an account with Citibank. Avetisyan went on-line to check her credit with Experian. Avetisyan discovered there were several accounts opened that were in collections and in good standing. There were a total of 39 unauthorized accounts with opened dates from 6/2004 to 6/2011. See attached credit report for information on the accounts. Avetisyan did not give anyone permission to use her personal information to open any accounts.

Avetisyan home address in Armenia is Orbeli Street 65 Building Apt #39, Yerevan, Armenia 0028. The home phone number is 37410226493.

Attached is the Experian credit report.

Lau 14402

EXHIBIT B

Date: 10/04/2012

Equifax Consumer Fraud Division
Po Box 740250
Atlanta, GA 30374

Haykuhi Avetisyan, SSN [REDACTED]

Re: Fraudulent account: AMERICAN EXPRESS#3499909570482103,AMERICAN EXPRESS#3499914110408763,AMERICAN EXPRESS#3499914150391973,APOLLO CREDIT AGENCY#1649799,ASSET ACCEPTANCE#11254.....,ASSET ACCEPTANCE#4038.....,ASSET ACCEPTANCE#4138.....,ASSET ACCEPTANCE#4205.....,ASSET ACCEPTANCE#4206.....,BANK OF AMERICA#488889199972.....,CAPITAL ONE#486236251193.....,CAVALRY PORTFOLIO SERVICE#13649661,CHASE BANK USA#558250861811.....,CITIFINANCIAL#607439554717.....,CREDIT ONE#CH34.....,EOS GROUP/EOS CCA#3176713,GE CAPITAL/DILLARDS#604587213342.....,GECRB/PEP BOYS#601918091708.....,HSBC BANK#549109861259.....,HSBC/NEIMN#4910242.....,MACYS#440267333.....,MIDLAND FUNDING#853584.....,MIDLAND FUNDING#853656.....,MIDLAND FUNDING#853932.....,NORDSTROM#822404.....,PINNACLE CREDIT SERVICES#LN.....,RCS/CVF CONSUMER ACQUI#7497596844.....,HOME DEPOT/CITIBANK#603532049311.....,US BANK#403769887577.....,WELLS FARGO BANK#446542018668.....

Dear Equifax Consumer Fraud Division:

My name is Haykuhi Avetisyan and I am a fraud victim within the definition of the Fair Credit Reporting Act §605B [15 U.S.C. §1681c-2]. My identity was fraudulently used to open credit account of which I learned much later. this fraudulent account has ruined my life and creditworthiness by reporting under my name. The authorities have been informed of the fraud and they cooperate in bringing resolution. After contacting the police department and the Federal Trade Commission, I was provided with the attached Identity Theft Report and Affidavit, which describe the situation in detail and list the fraudulent account and information.

Provided the circumstances of the matter and the proof of the fraud attached herein, I request that you block the reporting of the information in my credit file that I have identified as the result of identity theft no later than four (4) days after receipt of this notice. Furnishers of the fraudulent accounts shall be notified of the matter in detail; but nonetheless blocking of the information shall not be delayed for any reason the notification to furnishers shall follow the placement of a block on the fraudulent account.

Thank you in advance for your cooperation in resolving this matter.

Sincerely,

Haykuhi Avetisyan

EXHIBIT C

Haykuhi Avetisyan

[REDACTED]
Glendale, CA 91206

July 18, 2013

Equifax Consumer Fraud Division
Po Box 740250
Atlanta, GA 30374

SSN [REDACTED]

Dear Sir or Madam:

You have been informed on multiple occasions that I am a fraud victim within the definition of Fair Credit Reporting Act §605B [15 U.S.C. §1681c-2] and that the below identified accounts have been fraudulently opened in my name and reflect in my credit report. You have also been provided with copies of my police report and identity theft affidavit, which I am attaching again to this correspondence along with copies of my identification documents.

Regardless of my efforts, to date you have failed to block and delete the fraudulent accounts from my credit records, which include the following:

APOLLO CREDIT AGENCY #1649799
ASSET ACCEPTANCE #11254....
ASSET ACCEPTANCE #4138....
ASSET ACCEPTANCE #4205....
BANK OF AMERICA #488890099975....
BANK OF AMERICA #488889199972....
BANK OF AMERICA #7497599972....
CAPITAL ONE #486236251193....
CHASE BANK USA #558250861811....
CREDIT ONE #CH34....
DSNB/MACYS #440267333....
EOS CCA #3176713
HSBC BANK #549109861259....
HSBC/NEIMN #4910242....
MACYS #440267333....
MIDLAND FUNDING #853584....
MIDLAND FUNDING #853656....
MIDLAND FUNDING#853932....
NORDSTROM #822404....
PORTFOLIO RECOVERY #446542018668....
HOME DEPOT/CITIBANK #603532049311....

US BANK RMS CC #403769887577....
WELLS FARGO BANK #446542018668.....

The above accounts are also listed on the attached fraud affidavit along with personal information that is also inaccurate as a result of identity theft. Please have all of these blocked and deleted from my personal credit report.

Please do not delay this matter anymore than you already have. I cannot tolerate having these fraudulent accounts on my credit reports for a day longer.

Sincerely,

Haykuhi Avetisyan

EXHIBIT D

Haykuhi Avetisyan
[REDACTED]

Glendale, CA 91206

September 23, 2013

Equifax Consumer Fraud Division
Po Box 740250
Atlanta, GA 30374

SSN [REDACTED]

Dear Sir or Madam:

You have been previously informed that I am a fraud victim within the definition of Fair Credit Reporting Act §605B [15 U.S.C. §1681c-2] and you have been provided with copies of my police report, identity theft affidavit listing the fraudulent accounts, and copies of my identification documents on two separate occasions.

The following fraudulent accounts, however, were inadvertently left off of my previous correspondence:

American Express 66192128501138....

Chase Bank USA 514873179002....

Chase Bank USA 426684104760....

Chase- Pier 1 Imports 588896414895....

Citi Cards/Citibank 546616012616....

Citibank 37435000492....

Please consider this as a supplement to my previous correspondences and fraud affidavits and block and delete the above accounts from my credit report along with those I have previously identified as fraudulent.

Thank you,

Haykuhi Avetisyan

Haykuhi Avetisyan

EXHIBIT E

Haykuhi Avetisyan
[REDACTED]

Glendale, CA 91206

October 31, 2013

Equifax Consumer Fraud Division
Po Box 740250
Atlanta, GA 30374

SSN [REDACTED]

Dear Sir or Madam:

I have informed you on multiple occasions that I am a fraud victim and I have provided you copies of my police report, identity theft affidavit listing the fraudulent accounts, and copies of my identification documents.

However, after my many attempts, my Equifax credit report still reflects at least ten fraudulent accounts. Frankly, I have been drained trying to correct my credit report and clear my name from the fraudulent accounts and I am frustrated that I cannot get your cooperation with such important matter.

You have continuously failed to remove the fraudulent accounts from my credit reports and by your conduct you have multiplied the stress I have lived through as an identity theft victim. I cannot tolerate this fraudulent information being maintained in my name any longer, as a result of which I have put my life on hold, unable to use my credit even for essential necessities.

Although you cannot reverse the damage I have sustained as a result of the inaccurate reporting and your failure to timely correct, you can, however, prevent future damage by promptly deleting all of the fraudulent accounts from my credit report. Please understand that I have no accounts and every account that is reported on my credit report is a result of fraud.

Thank you and regards,
Haykuhi Avetisyan
Haykuhi Avetisyan

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Central District of California

HAYKUHI AVETISYAN, an individual;

Plaintiff(s)

v.

EQUIFAX INFORMATION SERVICES LLC, a
Georgia Limited Liability Company;

Defendant(s)

Civil Action No.

CV14-0161 JEM

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* EQUIFAX INFORMATION SERVICES LLC
C/O: CSC- LAWYERS INCORPORATING SERVICE
2710 Gateway Oaks Dr Ste 150N
Sacramento, CA 95833

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Armen Kiramijyan, Esq.
Vahag Matevosian, Esq.
KAASS LAW
313 East Broadway, #944
Glendale, California 91209

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

JAN - 8 2014

Date: _____

CLERK OF COURT


Signature of Clerk or Deputy Clerk

1184

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

I. (a) PLAINTIFFS (Check box if you are representing yourself ☐)

HAYKUHI AVETISYAN

DEFENDANTS (Check box if you are representing yourself ☐)

EQUIFAX INFORMATION SERVICES LLC

(b) County of Residence of First Listed Plaintiff Los Angeles

(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant _____

(IN U.S. PLAINTIFF CASES ONLY)

(c) Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.

Armen Kiramijyan, Esq. KAASS LAW
Vahag Matevosian, Esq. 313 East Broadway, #944
Glendale, CA 91209
Tel. 310.943.1171

Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.

II. BASIS OF JURISDICTION (Place an X in one box only.)

- ☐ 1. U.S. Government Plaintiff ☒ 3. Federal Question (U.S. Government Not a Party)
- ☐ 2. U.S. Government Defendant ☐ 4. Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES-For Diversity Cases Only
(Place an X in one box for plaintiff and one for defendant)

- | | | | | | |
|---|--------------------------------|--------------------------------|---|--------------------------------|--------------------------------|
| Citizen of This State | PTF <input type="checkbox"/> 1 | DEF <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in this State | PTF <input type="checkbox"/> 4 | DEF <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. ORIGIN (Place an X in one box only.)

- ☒ 1. Original Proceeding ☐ 2. Removed from State Court ☐ 3. Remanded from Appellate Court ☐ 4. Reinstated or Reopened ☐ 5. Transferred from Another District (Specify) ☐ 6. Multi-District Litigation

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check "Yes" only if demanded in complaint.)**CLASS ACTION** under F.R.Cv.P. 23: ☐ Yes ☒ No **MONEY DEMANDED IN COMPLAINT:** \$ Not Specified**VI. CAUSE OF ACTION** (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

FCRA, 15 U.S.C. Section 1681 et seq. - reporting of inaccurate credit information, failure to conduct proper reinvestigation and block/delete fraudulent credit information.

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES	CONTRACT	REAL PROPERTY CONT.	IMMIGRATION	PRISONER PETITIONS	PROPERTY RIGHTS
<input type="checkbox"/> 375 False Claims Act	<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 462 Naturalization Application	Habeas Corpus:	<input type="checkbox"/> 820 Copyrights
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 830 Patent
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 290 All Other Real Property	TORTS	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 140 Negotiable Instrument	PERSONAL INJURY	PERSONAL PROPERTY	<input type="checkbox"/> 530 General	SOCIAL SECURITY
<input type="checkbox"/> 450 Commerce/ICC Rates/Etc.	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 861 HIA (1395ff)
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 371 Truth in Lending	Other:	<input type="checkbox"/> 862 Black Lung (923)
<input type="checkbox"/> 470 Racketeer Influenced & Corrupt Org.	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.)	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 540 Mandamus/Other	<input type="checkbox"/> 863 DIWC/DIWW (405 (g))
<input checked="" type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits	<input type="checkbox"/> 330 Fed. Employers' Liability	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 340 Marine	BANKRUPTCY	<input type="checkbox"/> 560 Civil Detainee Conditions of Confinement	<input type="checkbox"/> 865 RSI (405 (g))
<input type="checkbox"/> 850 Securities/Commodities/Exchange	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158	FORFEITURE/PENALTY	FEDERAL TAX SUITS
<input type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)
<input type="checkbox"/> 891 Agricultural Acts	<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 355 Motor Vehicle Product Liability	CIVIL RIGHTS	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
<input type="checkbox"/> 893 Environmental Matters	REAL PROPERTY	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 440 Other Civil Rights	LABOR	
<input type="checkbox"/> 895 Freedom of Info. Act	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 710 Fair Labor Standards Act	
<input type="checkbox"/> 896 Arbitration	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 720 Labor/Mgmt. Relations	
<input type="checkbox"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision	<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 740 Railway Labor Act	
<input type="checkbox"/> 950 Constitutionality of State Statutes		<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 445 American with Disabilities-Employment	<input type="checkbox"/> 751 Family and Medical Leave Act	
			<input type="checkbox"/> 446 American with Disabilities-Other	<input type="checkbox"/> 790 Other Labor Litigation	
			<input type="checkbox"/> 448 Education	<input type="checkbox"/> 791 Employee Ret. Inc. Security Act	

FOR OFFICE USE ONLY:

Case Number:

CV-71 (11/13)

CIVIL COVER SHEET

CV14-0161

Page 1 of 3

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

VIII. VENUE: Your answers to the questions below will determine the division of the Court to which this case will most likely be initially assigned. This initial assignment is subject to change, in accordance with the Court's General Orders, upon review by the Court of your Complaint or Notice of Removal.

Question A: Was this case removed from state court? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," go to Question B. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	STATE CASE WAS PENDING IN THE COUNTY OF:		INITIAL DIVISION IN CACD IS:
	<input type="checkbox"/> Los Angeles		Western
	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo		Western
	<input type="checkbox"/> Orange		Southern
	<input type="checkbox"/> Riverside or San Bernardino		Eastern

Question B: Is the United States, or one of its agencies or employees, a party to this action? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," go to Question C. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	If the United States, or one of its agencies or employees, is a party, is it:		INITIAL DIVISION IN CACD IS:
	A PLAINTIFF?	A DEFENDANT?	
	Then check the box below for the county in which the majority of DEFENDANTS reside.	Then check the box below for the county in which the majority of PLAINTIFFS reside.	
	<input type="checkbox"/> Los Angeles	<input type="checkbox"/> Los Angeles	Western
	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	Western
	<input type="checkbox"/> Orange	<input type="checkbox"/> Orange	Southern
	<input type="checkbox"/> Riverside or San Bernardino	<input type="checkbox"/> Riverside or San Bernardino	Eastern
<input type="checkbox"/> Other	<input type="checkbox"/> Other	Western	

Question C: Location of plaintiffs, defendants, and claims? (Make only one selection per row)	A. Los Angeles County	B. Ventura, Santa Barbara, or San Luis Obispo Counties	C. Orange County	D. Riverside or San Bernardino Counties	E. Outside the Central District of California	F. Other
Indicate the location in which a majority of plaintiffs reside:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of defendants reside:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of claims arose:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

C.1. Is either of the following true? If so, check the one that applies:

- ☐ 2 or more answers in Column C
☐ only 1 answer in Column C and no answers in Column D

Your case will initially be assigned to the
SOUTHERN DIVISION.
Enter "Southern" in response to Question D, below.

If none applies, answer question C2 to the right. →

C.2. Is either of the following true? If so, check the one that applies:

- ☐ 2 or more answers in Column D
☐ only 1 answer in Column D and no answers in Column C

Your case will initially be assigned to the
EASTERN DIVISION.
Enter "Eastern" in response to Question D, below.

If none applies, go to the box below. ↓

Your case will initially be assigned to the
WESTERN DIVISION.
Enter "Western" in response to Question D below.

Question D: Initial Division?	INITIAL DIVISION IN CACD
Enter the initial division determined by Question A, B, or C above: →	Western

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

IX(a). IDENTICAL CASES: Has this action been previously filed in **this court** and dismissed, remanded or closed? ☒ NO ☐ YES

If yes, list case number(s): _____

IX(b). RELATED CASES: Have any cases been previously filed in **this court** that are related to the present case? ☒ NO ☐ YES

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

**X. SIGNATURE OF ATTORNEY
(OR SELF-REPRESENTED LITIGANT):** _____

DATE: 1/08/14

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet).

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))